# IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF OKLAHOMA

KRAIG BICKERSTAFF, et al.,

Plaintiffs,

Case No. 11-cv-1305-M

VS.

Hon. Vicki Miles-LaGrange

HALLIBURTON ENERGY SERVICES, INC.,

Defendant.

FRANK D. ELDRIDGE, et al.,

Plaintiffs,

Case No. 11-cv-1306-M

VS.

HALLIBURTON ENERGY SERVICES, INC.,

Defendant.

ROBIN L. BOOTH, et al.,

Case No. 11-cv-1308-M

Plaintiffs,

VS.

HALLIBURTON ENERGY SERVICES, INC.,

Defendant.

HARMEN ARLEN MAY, et al., Case No. 11-cv-1309-M Plaintiffs, VS. HALLIBURTON ENERGY SERVICES, INC., Defendant. LESLIE T. CAMPBELL, et al., Case No. 11-cv-1311-M Plaintiffs, VS. HALLIBURTON ENERGY SERVICES, INC., Defendant. EVELYN BERNICE SOUTHERLAND, Case No. 11-cv-1312-M Plaintiff, VS. HALLIBURTON ENERGY SERVICES, INC., Defendant.

TERRY CHEEK, et al.,

Plaintiffs,

Case No. 13-cv-0116-M

VS.

HALLIBURTON ENERGY SERVICES, INC.,

Defendant.

STEPHEN G. JONES, et al.,

Plaintiffs,

Case No. 11-cv-1322-M

VS.

HALLIBURTON ENERGY SERVICES, INC.,

Defendant.

# JOINT STIPULATION REGARDING CERTAIN CLAIMS AND DEFENSES

WHEREAS, Plaintiffs in the above-styled cases agree to voluntarily drop from their Complaints in the above-styled cases, the following claims: Strict Liability and Unjust Enrichment. As to Plaintiffs' Strict Liability claims, HESI agrees that it will not argue that any harm that might be proven could not have been prevented through the exercise of ordinary care, but does intend to argue that it did exercise ordinary care notwithstanding any harm that may have occurred.

WHEREAS, HESI agrees to file Amended Answers in each of the above-styled cases, dropping certain affirmative defenses with respect to each Plaintiff.

NOW, THEREFORE, the parties hereby stipulate and agree that Plaintiffs' claims for unjust enrichment and strict liability, and certain affirmative defenses previously pled but not included in Amended Answers filed this date, shall no longer be part of these cases.

#### STIPULATED AND AGREED:

#### s/ Wes Johnston

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-and-

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Attorneys for Defendant, Halliburton Energy Services, Inc.

## **CERTIFICATE OF SERVICE**

This is to certify that on this 29th day of May, 2015, a true and correct copy of the above and foregoing was served electronically via the ECF system for the USDC for the Western District of Oklahoma, to all counsel of record.

s/ Gerald P. Green